

### REMARKS

This amendment is in response to the Office Action of May 25, 1999 in which the Examiner objected to the Information Disclosure Statement and claims for certain formal reasons. With respect to the Information Disclosure Statement, applicants' representative filed copies of the publications in a related application. The applicants' representative is in the process of petitioning for a suspension of the rules to allow for the filing of one set of references to satisfy the filing requirements in a number of related cases.

With respect to the claim objections, the article "The" has been substituted for the article "A" in the noted claims. The other objections noted by the Examiner are believed to have been overcome by the amendments herein.

With respect to the Examiner's objection to the term "substantially" and the like, the claims have been amended in order to recite the related structure. For example, at least one of the semiconducting layers in the insulation layer form a monolithic structure having a coefficient of thermal expansion which is substantially the same. It should be understood that substantially does not necessarily have to be exactly the same because, it is often difficult to have two materials with exactly the same properties at all times and under all conditions.

However, in the context of the invention, the coefficients of thermal expansion are sufficient so that these layers stay together and form a monolithic structure as set forth in the specification. Thus, it is believed that the claim as amended recites structure which renders the claim definite.

The inner and outer semiconducting layers have been clearly recited.

Claim 13 has been amended to more clearly recite the arrangement of windings radially of the stator.

Various elements noted by the Examiner have been positively recited.

Certain claims are rejected as allegedly anticipated by Elton '165. Other claims are rejected as allegedly obvious over Elton in view of Nikitin '244. Some claims are rejected over Elton '165 in view of Olsson et al. '098.

The rejection of the claims is respectfully traversed for the reasons set forth below.

Elton '165 describes a high voltage cable having an inner layer of semiconducting pyrolized glass fiber material and/or an outer layer of the same material wherein the outer layer is grounded. When Elton et al. '165 is viewed as an whole, it does not show the cable of the invention nor does it suggest that such a cable would be useful in an electric machine of the present application.

The Examiner asserts that Elton '165 discloses the claimed invention except for having a winding comprising strands which are uninsulated. The Examiner asserts further that Nikitin teaches such features and thus it would be obvious to combine the references.

However, it is respectfully submitted that once the teaching of Elton is fully considered, the combination asserted by the Examiner should be withdrawn.

Even though it is suggested in Elton to apply a semiconducting layer to a winding in a dynamo-electric machine, there is no indication to use the cable in Elton in a dynamo-electric machine. Indeed, the disclosure of Elton '165 describes three or four different applications for a semiconducting layer. One application is for using a pyrolized glass layer in a conventional high current, low voltage winding of a dynamo-electric machine. A second application is for a housing to reduce electric discharge in an enclosed circuit. Finally, Elton '165 employs a semiconducting pyrolized glass layer in a conventional cable.

However, there is no proposal to use the cable shown in Elton in the insulating layer in a dynamo-electric machine. It is only the semiconducting tape that is used in an electric machine. The arrangement in Elton does not provide a solid insulating system as described and disclosed in the present invention. It cannot be considered obvious to one skilled in the art to use such a cable in a machine

because the time of the invention, it was not known to use such a cable with solid insulation as a winding in a machine and there is no teaching that would lead one skilled in the art to such a conclusion.

With respect to the Examiner's combination of Elton in view of Nikitin, neither reference shows a cable having insulated conductors. Elton '165 particularly shows a plurality of strands, but there is no suggestion that the strands are mutually insulated. Nikitin shows a high voltage element in an insulating sleeve. Nikitin purports to develop a high voltage generator, but is based on a complex and expensive oil/paper insulation systems used for both the insulation and cooling as is done in conventional power transformers. This differs from the invention in many respects. One of the most important features of the invention is that it uses solid insulation with semiconducting layers giving full control of the electric fields within the stator winding as it is positioned in the stator and the end region areas.

Nikitin et al. indeed shows an arrangement of a cable type termination around high voltage elements. See for example, column 3, lines 21-26. Outside the termination, in the end region, the electric field is no longer confined within the stator winding. The end winding region of Nikitin is filled with oil for insulation

and cooling. The present invention does not use end winding termination or oil insulation and seeks to avoid any such arrangement for end winding control.

Another important difference is that Nikitin teaches a limited number of slots per pole in the stator winding. See for example column 2, line 68 and column 3, line 1 and Fig. 3. The present invention uses numerous slots per pole.

Olsson shows a high voltage cable with an outer screen and mantle. However, none of the references suggest that such a cable would be useful in a high voltage machine. The strands in Olsson are not mutually insulated and would be thus susceptible to high eddy currents which could damage the machine during sustained operation.

The Examiner's attention is respectfully directed to Breitenbach et al. 4,785,138 which has been cited in a number of related applications, some of which are noted in the Information Disclosure Statement. Breitenbach et al. discloses a cable for use in a linear motor where the cable includes a current carrying conductor, a conductive inner layer surrounding a conductor, an insulation layer surrounding an inner layer and an outer conductive layer surrounding the insulating and a conductive sheathing surrounding the entire cable. The present invention is directed to a generating device in which at least one of the windings comprises a cable including a conductive member, an inner

layer of semiconducting material, an insulation layer and an outer layer. In addition, the present invention employs insulated and uninsulated strands in the conductive core. Breitenbach et al. discloses an electric cable for use as a phase winding in a linear motor. In such motors, the stator can be very long and the winding is fixed in a meander like manor. Linear motors are used in intermittent service, for example, as a motor power unit in a train or for railway operations. In such applications, the stator is divided into sections, each section length being several hundred meters. The length of the stator is such that the inductance and consequently the reluctance of the winding is very high. Therefore, voltages of about 10KV are needed to get sufficiently high current in the winding for driving trains. Such a high current requires a conductor with considerable total conducting area. However, the voltage is still only in a low voltage region of up to about 1-10kV. Electric machines of the type described in the invention differ from a linear motor generally in that the former is run continuously using the same windings whereas a linear motor is run intermittently and has time to cool off. The insulated strands in the core element of the present invention prevent high eddy currents from overheating the cable. Breitenbach also suggests that the conductive outer layer allows a path for charge currents to surround as to prevent scorch spots where the cable phases

come in contact. The present invention is designed to avoid high currents in the cable insulation.

In view of the foregoing, it is respectfully requested the Examiner reconsider his rejection of the claims, the allowance of which is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John P. DeLuca', is written over a horizontal line.

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